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(see other counsel on signature page)

IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

In re:

: Chapter 11 SEARS HOLDINGS CORPORATION, :

et al, : Case No. 18-23538 (RDD)

:

Debtors. : (Jointly Administered)

:

NOTICE OF WITHDRAWAL OF ERISA PLAINTIFFS' OBJECTION TO THE MOTION OF DEBTORS FOR ENTRY OF AN ORDER EXTENDING THE AUTOMATIC STAY TO CERTAIN NON-DEBTOR PARTIES

PLEASE TAKE NOTICE that Robert A. Catalfamo and Lavarita D. Meriwether, plaintiffs in the consolidated ERISA action, captioned *In Re 2017 Sears Holdings Corp ERISA Litigation*, No. 1:17-cv-05230 (N.D. Ill.) (the "ERISA Plaintiffs"), hereby withdraw without prejudice to refiling or seeking other or related relief, their Objection (ECF 1197), dated December 13, 2018 to the *Motion of Debtors for Entry of an Order Extending the Automatic Stay to Certain Non-Debtor Parties* (ECF 924), dated November 28, 2018.

Dated: March 14, 2019 Respectfully submitted,

KELLER ROHRBACK L.L.P.

/s/ Tanya Korkhov

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